

ORIGINAL



0000095899

Roger Chantel
[REDACTED]
[REDACTED]

RECEIVED

2009 APR 17 A 10:34

Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

AZ CORP COMMISSION
DOCKET CONTROL

Docket No. E-01750A-09-0149

Response to Mohave Electric's
Motion to Dismiss

There are a number of issues in this complaint. I would like to address ACC Rule 14-2-211. This rule is clear that a utility will not disconnect the service of a customer that has a medical need. When Mohave Electric Cooperative, Inc. (hereinafter known as MEC) disconnected the electricity to my residence they may not have been aware of my medical need. Exhibit "A" is a letter to the managing staff of MEC requesting that I be put on their list for continuous electricity and a request for reinstatement of electricity.

Exhibit "B" is a bill of \$12,135.09 that was sent to me by MEC. In that letter MEC stated that I must enter into a contract for services to reconstruct and connect the three phase 14,40/24,900 KV loop system to meet (NESC). This cost is estimated at somewhere around \$40,000 to \$50,000. Exhibit "C" is a letter stating that my electricity will not be restored until I pay these costs in full. I do not have the ability to pay this bill and I meet all of the conditions that exist in ACC Rule 14-2-211.

I am requesting the Commissioners to enforce ACC Rule 14-2-211 and issue an order to MEC to reinstate the electricity to [REDACTED]

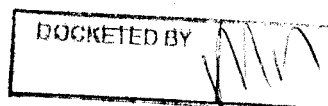
We are requesting that the Arizona Corporation Commission deny Mohave Electric's Motion to Dismiss Complaint.

Submitted by:

Roger Chantel
Complainant

Arizona Corporation Commission
DOCKETED

APR 17 2009



Original mailed this 16th day of April, 2009 to:

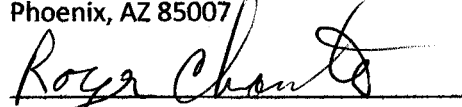
Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Copies mailed on this 16th day of April, 2009 to:

Michael A. Curtis
Larry K. Udall
501 East Thomas Road
Phoenix, AZ 85012-3205
Attorneys for Mohave Electric Cooperative, Inc.

Lyn Farmer, Chief Hearing Officer
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Janice Alward, Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007


Roger Chantel

January 29, 2009

Roger Chantel
[REDACTED]
[REDACTED]

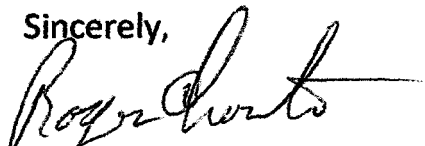
Mohave Electric Cooperative
928 Hancock Road
Bullhead City, AZ 86430

To the Board Members and managing staff of Mohave Electric Cooperative

I, Dustin Roger Chantel (hereinafter referred to as Roger Chantel) request that I be placed on Mohave Electric Cooperative's medical list because I have a medical condition that requires continuous electric service without disruption. I have been diagnosed with Sleep Apnea and the treatment of this condition is the need for a breathing machine which requires continuous electric service. I am supplying you a copy of the prescription of the machine that I am required to use in order to maintain my health.

This is a formal request to reinstate the electricity to my place of residence at [REDACTED] This is a request for reinstatement of my electricity upon the receipt of this letter. YOUR IMMEDIATE ACTION TO THIS MATTER WOULD BE GREATLY APPRECIATED.

Sincerely,


Roger Chantel

7000 1300 4000 1532

U.S. Postal Service TM		
CERTIFIED MAIL TM RECEIPT		
(Domestic Mail Only; No Insurance Coverage Provided)		
For delivery information visit our website at www.usps.com		
BULLHEAD CITY AZ 86430		
OFFICIAL USE		
Postage	\$ 0.42	0360
Certified Fee	\$2.70	07
Return Receipt Fee (Endorsement Required)	\$2.20	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 15.32	01/29/2009

Sent To
Mohave Electric Cooperative
Street, Apt. No.,
or PO Box No. 928 Hancock Road
City, State, ZIP+4
Bullhead City, AZ 86430

PS Form 3800, August 2006 See Reverse for Instructions



P.O. Box 1045, Bullhead City, AZ 86430

October 21, 2008

Mr. Roger Chantel
[REDACTED]
[REDACTED]

Mr. Chantel:

Enclosed is a bill in the amount of \$12,135.09 due to Mohave Electric Cooperative, Inc., for costs to disconnect service to [REDACTED] (due to safety violation, National Electric Safety Code [NESC]: Table 234-1), and costs to relocate service to the railroad. At this time, in order to reconnect service to [REDACTED] you will need to:

1. Contact Mohave Electric, Engineering Department, and enter into a contract for services to reconstruct and connect the three phase 14,400/24,900 KV loop system to meet (NESC).
2. Or, remove the building/structure currently located under the line that was disconnected on 9/16/08. Upon removal the building, the line would be reconnected at the original site which met NESC. This may require additional costs to you as the property owner.

Mohave Electric has verified that you are not and have never been on the customer medical/critical list which is maintained by our office.

Sincerely,


Thomas Longtin
Manager of Operations and Engineering

/prg

cc: Arizona Corporation Commission





P.O. Box 1045, Bullhead City, AZ 86430

September 15, 2008

Roger Chantel
[REDACTED]
[REDACTED]

Via Certified Letter

Re: Disconnection of Electric Service
9455 E. Highway 66 (APN 313-11-006)

Dear Mr. Chantel:

As you are aware, Mohave Electric Cooperative, Inc. was informed that you were constructing a building directly beneath an existing overhead electric line. A field review of the property revealed that the building you are constructing is in violation of clearance requirements mandated by the National Electric Safety Code.

Mohave County and Mohave Electric Cooperative, Inc. have previously requested that you cease construction on this building. You have refused. As a result, the Mohave County Division of Building Inspection has requested that Mohave Electric Cooperative immediately disconnect electric service to your property.

Please be advised that you will be held responsible for all costs incurred by Mohave Electric Cooperative as a result of this action. These costs shall include the construction costs associated with the de-energization of this line segment (made necessary by your construction of this structure too close to the electric line), as well as the construction costs associated with re-establishing electric service to a neighboring customer who would be also affected by the de-energization of this line segment. In addition, you will be responsible for the costs of relocating the existing overhead electric line to permanently meet the electric code clearances.

Electric service will not be restored to your premises until these costs are paid in full.

Mohave Electric's Service Rules and Regulations, on file with the Arizona Corporation Commission, cite that unsafe conditions are grounds for the disconnection of electric service.



If you have any questions or need more information please contact me at (928) 758-0580.

Sincerely,

Mohave Electric Cooperative, Inc.

A handwritten signature in dark ink, appearing to read "John H. Williams", with a long horizontal flourish extending to the right.

John H. Williams
Line Extension Supervisor

cc: Thomas Longtin
Neil Garney
Dispatch
File